

## David A. Porter

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**From:** Jacob Campbell <[jacob@rossmanpc.com](mailto:jacob@rossmanpc.com)>  
**Sent:** Friday, October 9, 2020 2:12 PM  
**To:** David A. Porter; Mark Rossman; John Flores  
**Cc:** Elizabeth Hardy  
**Subject:** RE: Plaintiff v. Wayne State et al. (20-cv-11718) - Conference Call

Thank you David. Please let us know about next week.

With respect to your second point, we do not concur in the requested relief, which would vacate the Protective Order as entered, but we will not oppose your intended motion for reconsideration filing.

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**From:** David A. Porter <[DPorter@KHPF.com](mailto:DPorter@KHPF.com)>  
**Sent:** Friday, October 9, 2020 1:22 PM  
**To:** Jacob Campbell <[jacob@rossmanpc.com](mailto:jacob@rossmanpc.com)>; Mark Rossman <[mark@rossmanpc.com](mailto:mark@rossmanpc.com)>; John Flores <[rfloresesq@verizon.net](mailto:rfloresesq@verizon.net)>  
**Cc:** Elizabeth Hardy <[ehardy@khvpf.com](mailto:ehardy@khvpf.com)>  
**Subject:** RE: Plaintiff v. Wayne State et al. (20-cv-11718) - Conference Call

Jacob,

Liz and I will check our schedules and get back to you regarding our availability next week.

In the meantime, as I'm sure you're aware, the Court entered an order yesterday granting your motion for protective order before we had an opportunity to respond under the court rules. We intend to file a motion for reconsideration, asking the court to vacate its decision and consider our response before making a decision. Will you concur the requested relief?

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 VIVIANO PELTON FORREST

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**From:** Jacob Campbell <[jacob@rossmanpc.com](mailto:jacob@rossmanpc.com)>  
**Sent:** Friday, October 9, 2020 9:45 AM  
**To:** David A. Porter <[DPorter@KHPF.com](mailto:DPorter@KHPF.com)>; Mark Rossman <[mark@rossmanpc.com](mailto:mark@rossmanpc.com)>; John Flores <[rfloresesq@verizon.net](mailto:rfloresesq@verizon.net)>  
**Cc:** Elizabeth Hardy <[ehardy@khvpf.com](mailto:ehardy@khvpf.com)>  
**Subject:** RE: Plaintiff v. Wayne State et al. (20-cv-11718) - Conference Call

Good morning David,